



U.S. Department of Justice

United States Attorney Southern District of New York

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

MEMO ENDORSED

October 30, 2023

By ECF

The Honorable Edgardo Ramos United States District Judge Southern District of New York 40 Foley Square New York, New York 10007

Re: United States v. Thomas Santos, et al., S1 20 Cr. 481 (ER)

Dear Judge Ramos:

The Government writes respectfully regarding upcoming pretrial deadlines in this case, which currently require the parties to submit pretrial filings on November 6, 2023. (*See* Doc. No. 190).

Counsel for Erik Suarez is currently preparing for another trial, and the Government is currently engaged in discussions with counsel for Adrean Coombs about a potential pretrial resolution of his case. The Government has conferred with counsel for Mr. Suarez and Mr. Coombs, both of whom consent to an adjournment of the pretrial filing deadlines.

Accordingly, the Government respectfully requests that the deadline to file pretrial materials, and responses thereto, be adjourned for a period of two weeks. The Government will promptly provide additional updates to the Court as they become available.

Pretrial filings are due November 20, 2023.

SO ORDERED.

Edgardo Ramos, U.S.D.J.

Dated: 11/2/2023 New York, New York

cc: Counsel of Record (via ECF)

Respectfully submitted,

DAMIAN WILLIAMS United States Attorney Southern District of New York

By: /s/ Jarrod L. Schaeffer

Jarrod L. Schaeffer / Elizabeth A. Espinosa Assistant United States Attorneys

Tel: (212) 637-2270 / 2216